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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,)
Plaintiff,)
v.)
\$10,500.00 IN UNITED STATES CURRENCY,)
Defendant.)
Case No.: 1234567890

**UNITED STATES' UNOPPOSED MOTION TO
CONTINUE THE CAFRA DEADLINE
FOR THE UNITED STATES TO FILE ITS COMPLAINT**

The United States of America (“United States”), by and through Daniel G. Bogden, United States Attorney for the District of Nevada and Michael A. Humphreys, Assistant United States Attorney, respectfully moves this Court to grant an extension of time, until and including May 20, 2012, for the United States to file its complaint in the above-captioned matter. The CAFRA deadline for the United States is March 19, 2012.

Under CAFRA, the United States is obliged to file its Complaint for Forfeiture within 90 days of receiving a referral from the agency that has received an administrative claim. 18 U.S.C. § 983(a)(3)(A). That same section allows the 90-day deadline to be extended by stipulation of the parties as authorized by the court.

1 In this case, the Government continues to investigate this matter to ascertain the basis for
2 seizure that has led to the filing of an administrative claim by Tarik Soodan. Such investigation will
3 likely be concluded within the next 60 days, whereupon the United States will make a decision about
4 whether to proceed with the judicial process in this matter.

5 Government counsel discussed the matter of a government continuance with Claimant's
6 counsel, Scott Freeman, on March 14, 2012, and Attorney Freeman gave Government counsel
7 authorization to represent to this Court that he consents to this motion.

8 This motion is not submitted solely for the purpose to delay or for any other improper
9 purpose.

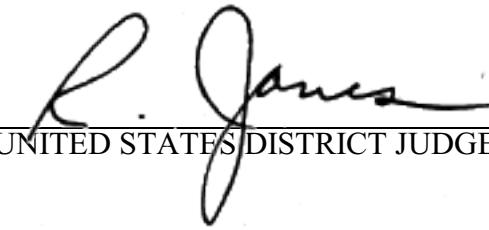
10 WHEREFORE, the United States moves this Court to grant its motion to extend the time for
11 the United States to file its Complaint for Forfeiture in this matter for an additional 60 days, or until
12 May 20, 2012.

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14 DATED this 15th day of March, 2012.

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16 Respectfully submitted,
17 DANIEL G. BOGDEN
United States Attorney

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19 _____
20 /s/Michael A. Humphreys
MICHAEL A. HUMPHREYS

21 IT IS SO ORDERED: March 21, 2012

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UNITED STATES DISTRICT JUDGE